

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ADMINPROS, LLC, an Illinois Limited)	
Liability Company,)	
)	
Plaintiff,)	
)	Case No. 13-cv-4352
v.)	
)	Hon. Gary Feinerman
PUBLIC AFFAIRS COUNSEL, INC., an)	
Alabama Corporation, and RICHARD)	
WILLIS, an Individual,)	
)	
Defendants.)	
)	
)	

INITIAL STATUS REPORT

The parties through their respective counsel, as listed below, submit the following initial status report.

A. Nature of the Case

1. Attorneys of Record, and lead trial counsel for each party.

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Attorneys for defendants Public Affairs Counsel, Inc. and Richard Willis

2. *Basis for Federal Jurisdiction.*

This Court has federal jurisdiction over plaintiff's claims for breach of contract and other relief pursuant to 28 U.S.C. § 1332 based on the diversity of citizenship of the parties and because the amount in controversy exceeds \$75,000.

3. *Nature of the claim(s) and any counterclaim(s), including the amount of damages and other relief sought.*

Plaintiff asserts three claims in this lawsuit: (1) breach of contract against defendant Public Affairs Counsel, Inc. ("Public Affairs"); (2) tortious interference with contract against Public Affairs and defendant Richard Willis ("Willis"); and (3) defamation *per se* against Willis. In sum, plaintiff alleges that Public Affairs and Willis purposefully and unlawfully interfered with and impaired plaintiff's contractual relationship with the Mississippi Department of Corrections ("MDOC"), and that Willis made several false and defamatory statements concerning plaintiff and its principal member. Plaintiff seeks damages in an amount exceeding the statutory minimum, in addition to its reasonable attorneys' fees and costs.

4. *Whether the defendants will answer the complaint or, alternatively, whether the defendant will otherwise plead to the complaint.*

The parties have scheduled a mediation of this dispute to take place on September 13, 2013 in Jackson, Mississippi at a mutually agreeable location. Defendants have not yet filed a responsive pleading in this case.

5. *Principal legal and factual issues.*

The principal legal and factual issues can be summarized as follows:

- Whether Public Affairs materially breached its obligations under a Consulting Agreement with plaintiff;
- Whether Public Affairs and Willis purposefully and unlawfully interfered with plaintiff's contractual relationship with MDOC;

- Whether Willis defamed plaintiff and its principal member causing reputational detriments and other damage by falsely accusing plaintiff's principal member of "cheating him out of money" to third parties;
- Whether Willis, and through him Public Affairs as his principal, solicited and encouraged officers of Investigative Research to join Public Affairs in filing a lawsuit against plaintiff; and
- Whether Willis, and through him Public Affairs as his principal, spoke with the Director of MDOC and instructed him to elect to terminate its written contracts with plaintiff and use an alternate consulting group to perform the work under these contracts.

6. *Which defendants have been served with process, which defendants have not been served, and the status of efforts to effect service on the unserved defendants.*

The Defendants have not been served with process. If the pending mediation is not successful, Plaintiff will serve the Defendants with process.

B. Proceedings to Date

1. *Summary of all substantive rulings (including discovery rulings) to date.*

There have been no substantive rulings to date.

2. *Description of all pending motions, including date of filing and briefing schedule.*

There are no pending motions.

C. Discovery and Case Plan

1. *Summary of discovery, formal and informal, that has already occurred.*

None.

2. *Whether discovery will encompass electronically stored information, and the parties' plan to ensure that such discovery proceeds appropriately.*

The parties do not anticipate that discovery will include a significant amount of electronically stored information.

3. *Proposed scheduling order.*

The parties respectfully request a stay of any and all case deadlines until after the mediation is conducted on September 13, 2013. If the parties are unable to resolve this dispute through mediation, the parties will submit a proposed scheduling order within 5 days of the mediation.

4. *Whether there has been a jury demand.*

Plaintiff has made a jury demand.

5. *Estimated length of trial.*

The parties anticipate that the trial will last 2-3 days.

D. Settlement

1. *Describe settlement discussions to date and whether those discussions remain ongoing.*

The parties have scheduled a mediation of this dispute to take place on September 13, 2013 in Jackson, Mississippi at a mutually agreeable location.

2. *Whether the parties request a settlement conference.*

In light of the fact that the parties have scheduled a mediation to take place on September 13, 2013, the parties do not request a settlement conference at this time.

E. Magistrate Judge

1. *Whether the parties consent to proceed before a magistrate judge for all purposes.*

The parties do not consent to proceed before a Magistrate Judge at this time.

2. *Any particular matters that have already been referred to the magistrate judge, and the status of those proceedings.*

None.

AGREED TO IN FORM:

/s/ Timothy E. Horton
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4845-4765-4933.1

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ENTER: _____
GARY FEINERMAN
United States District Judge